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Attorney for NELDA ASUNCION

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

| | | |
|-------------------------------|---|-------------------------------|
| THE UNITED STATES OF AMERICA, |) | No. CR-08-0477 DLJ |
| |) | |
| Plaintiff, |) | STIPULATION AND |
| |) | PROPOSED ORDER FOR |
| vs. |) | PERMISSION TO TRAVEL |
| |) | OUT OF NORTHERN DISTRICT |
| NELDA ASUNCION, |) | |
| |) | |
| Defendant. |) | |

The Defendant NELDA ASUNCION, through her counsel, DEBORAH G. LEVINE and Assistant United States Attorney, DEBORAH R. DOUGLAS, do hereby stipulate that Defendant, Nelda Asuncion, be permitted to travel out of the Northern District to San Joaquin County, where she has family, with prior approval of pre trial services but without the need for further court order.

The defendant is currently in compliance with the conditions of her pre-trial release. United States Pre-Trial Service Officer Paul Mamaril has suggested this modification of prior orders in order to allow Mrs. Asuncion to visit family members who live in San Joaquin County without the need of court orders. All other release conditions to remain unchanged.

For the forgoing reasons, the parties stipulate and agree that Nelda Asuncion be permitted to travel out of the Northern District of California to San Joaquin County, California with prior pre trial services approval but without the need of further court order.

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1 IT IS SO STIPULATED:

2 Dated: January 30, 2009

/s/ Deborah R. Douglas
DEBORAH R. DOUGLAS
Assistant United States Attorney

5 Dated: January 30, 2009

/s/ Deborah G. Levine
DEBORAH G. LEVINE
Attorney for Nelda Asuncion

8
9 **[PROPOSED] ORDER**

11 UPON STIPULATION OF THE PARTIES AND FOR GOOD CAUSE SHOWN, THE COURT
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13 HEREBY AUTHORIZES NELDA ASUNCION TO TRAVEL OUT OF THE NORTHERN DISTRICT
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15 OF CALIFORNIA TO SAN JOAQUIN COUNTY WITH PRIOR APPROVAL OF PRE TRIAL
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17 SERVICES BUT WITHOUT THE NEED FOR ADDITIONAL COURT ORDER. THIS
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19 MODIFICATION OF HER CONDITIONS OF PRE TRIAL RELEASE IS BEING ORDERED SO
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21 THAT NELDA ASUNCION CAN MORE EASILY VISIT FAMILY MEMBERS WITHOUT
22
23 FURTHER COURT ORDER. ALL OTHER RELEASE CONDITIONS REMAIN UNCHANGED.
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21 IT IS SO ORDERED

22 Dated: January 30, 2009


WAYNE D. BRAZIL
UNITED STATES MAGISTRATE JUDGE